## UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

In re	) Chapter 7	
	)	
CARIOSCIA, CHRISTINE	) Case No. 08-24678-SQ	U
	)	
	) Hon. JOHN H. SQUIRI	ES

## APPLICATION OF TRUSTEE'S COUNSEL OR OTHER PROFESSIONALS FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES

TO: HONORABLE JOHN H. SQUIRES BANKRUPTCY JUDGE

GINA B. KROL, counsel for the Trustee pursuant to 11 U.S.C. §330 and FRBP 2016 submits this application for compensation and reimbursement of expenses and represents to the Court as follows:

- 1. An order for relief under Chapter 7 was entered on September 18, 2008. On November 14, 2008, an order was entered approving the employment of Counsel for the Trustee. Counsel has received \$0.00 in previously awarded compensation and reimbursement of expenses.
- 2. Applicant requests \$6,091.25, in compensation for 17.90 hours of services performed for the period February 9, 2009 through present and reimbursement of actual expenses in the amount of \$119.52.
- 3. A description of the nature of the services rendered by the Applicant is as follows:

## ADVERSARY COMPLAINT

Trustee directed her attorneys to prosecute an adversary proceeding against the Debtor's children for an alleged fraudulent conveyance of the Debtor's residential real estate. Cohen & Krol prepared the complaint, initiated and took discovery, appeared at required court hearings, prepared the Trustee's pre-trial statement, assisted the Trustee in negotiating a settlement with opposing counsel and obtained the required order approving the settlement of the adversary proceeding. The proceeds of the settlement are on hand with the Trustee and it is from these proceeds that Trustee will make a distribution to creditors. Cohen & Krol expended 16.30 hours in the activity of adversary complaint.

## PROFESSIONAL EMPLOYMENT

Cohen & Krol sought and obtained the necessary order authorizing the Trustee to retain them as her attorneys in this case. Cohen & Krol expended 1.60 hours in the activity of professional employment.

- 4. Attached as Exhibit "A" is an itemized statement of the legal services rendered. The statement reflects the legal services rendered, the time expended and a description of the work performed.
  - 5. The time expended and services rendered by Applicant is summarized as follows:

<u>Attorney</u>	<u>Hours</u>	Hourly Rate	<u>Total</u>
GINA B. KROL/GBK2008	.85	395.00	335.75
GINA B. KROL/GBK2009	6.10	405.00	2,470.50
YAN TEYTELMAN/YT2008	3.45	300.00	1,035.00
YAN TEYTELMAN/YT2009	7.50	300.00	2,250.00

- 6. Attached as Exhibit "B" is an itemized statement of the actual expenses incurred by the Applicant.
- 7. Based on the nature, extent and value of services performed by the Applicant, the results achieved, and the costs of comparable services, the compensation and reimbursement of expenses sought are fair and reasonable.
- 8. At all times during Applicant's representation of the Trustee, Applicant was a disinterested person and neither represented nor held an interest adverse to the estate with respect to matters on which Applicant was employed.

WHEREFORE, Applicant requests that it be awarded reasonable compensation of \$6,091.25 and reimbursement of actual and necessary expenses of \$119.52 for legal services rendered in this case.

RESPECTFULLY SUBMITTED,

Date: August 11, 2011 /s/ Gina B. Krol

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